



September 23, 2019

VIA ECF

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Hon. Leda Dunn Wettre, U.S.M.J.
United States District Court for the District of New Jersey
Martin Luther King, Jr. Federal Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: Erin Henderson v. New York Jets, LLC
Civil Action No. 2:17-cv-10110 (SDW) (LDW)

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Dear Judge Wettre:

On behalf of defendant New York Jets, LLC, I am writing to provide an update on the discussions between the parties regarding plaintiff's expert witness, Michael Lombardi. On September 23, 2019, Defendant requested further clarifications regarding Mr. Lombardi's opinion. Today, Plaintiff provided further clarifications. In order to allow me to confer with my client and then with Mr. Lavigne, we propose to report to Your Honor again mid-to-late next week on how we propose to proceed, if that is acceptable to the Court. Mr. Lavigne has agreed to this proposal.

Respectfully submitted,

/s/Adam Saravay

Adam Saravay

cc: Larry Lavigne, Esq. (by ECF)

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